

April 15, 2002

Magalie Roman Sales
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 94-102
E911 / TTY Digital Deployment Quarterly Report
First Quarter 2002

Dear Ms. Sales:

Western Wireless Corporation ("Western") and its subsidiaries listed in Attachment A, pursuant to the Federal Communications Commission's ("Commission") Fourth Report and Order in CC Docket No. 94-102, hereby files its Quarterly Report for the quarter ending March 31, 2002, detailing its current progress on the deployment of digital enhanced 911 ("E911") TTY accessibility.

Western provides Commercial Mobile Radio Service ("CMRS") in 19 states west of the Mississippi River and operates under the CellularOne brand name. Its network is comprised of equipment from multiple manufacturers and infrastructure providers. Western operates analog CMRS throughout its entire network, and provides digital CDMA and digital TDMA service in many of its markets.

Western is committed to meeting the FCC requirements that wireless carriers provide 911 access to hearing-impaired persons via a TTY device. Western is engaged in detailed discussions with its vendors regarding the availability of digital equipment that will support the FCC requirements, and currently its analog network is capable of routing 911 calls via a TTY device to a TRS provider. Furthermore, Western's network uses switching components from Nortel Networks, and Lucent Technologies, and provides service to customers from a wide range of handsets and mobile devices. Additionally, its network is available to accommodate roaming traffic from a wide assortment of carriers.

In January 2002, Nortel released its TDMA and CDMA TTY solution which has been verified to perform to the appropriate standards. Nortel successfully completed internal interoperability testing with commercial TTY capable mobile terminals and with leading manufacturers of TTY public safety equipment. Nortel also completed external verification activities with independent TDMA and CDMA

operators. These tests effectively demonstrated the acceptable capabilities of the Nortel solution. Nortel has determined that the MTX10 software stream will enable full network support for TTY users. Western has either completed, or is scheduled to complete, the installation of MTX10 on all of its Nortel equipment before the June 30, 2002 FCC deadline.

Western also provides service from Lucent equipment using both TDMA and CDMA technologies. Lucent has announced that its equipment is compatible with digital TTY 911 dialing at ECP software load 16.1. Western has completed this necessary software upgrade in all of its Lucent markets except one. This last market is schedule to be upgraded to ECP 16.1 in June prior to the FCC deadline.

Western is preparing a testing schedule to validate and demonstrate these services on its own equipment during the month of May. It will document its trials from both Nortel and Lucent equipment and from both TDMA and CDMA technologies. Furthermore, this testing will ensure that hearing-impaired customers will be able to successfully dial 911 from a TTY device using Western's digital network. The results of these tests will be reported in Western's next quarterly TTY report to the FCC.

In conclusion, Western will continue to move towards compliance with all aspects of the Commission's Fourth Report and Order. Western fully expects to have these services deployed on its network in time to satisfy the FCC deadline. Furthermore, it will continue to provide access to TTY services via its existing analog network, and as the equipment and software upgrades mentioned above are incorporated into Western's network it will begin to make these services and features, including TTY access to the 911 dialing code, available to its hearing-impaired TTY-using customers and the public.

Respectfully Submitted,

Nathan Glazier
Regulatory Specialist

Attachment A

Western Wireless Corporation Subsidiaries

WWC Holding Co., Inc.
WWC License L.L.C.
WWC Texas RSA L.P.